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**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

WISCONSIN ALUMNI RESEARCH
FOUNDATION,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 3:14-cv-00062-BCC

FILED UNDER SEAL

**DECLARATION OF JOHN MYLIUS
IN SUPPORT OF APPLE’S OPPOSITION TO WARF’S MOTION TO
COMPEL
DISCOVERY REGARDING ACCUSED PROCESSORS**

I, John Mylius, hereby declare as follows:

1. I am employed by Apple Inc. I have worked for Apple since 2008. My current title is CPU Micro-architecture Lead. I have held this position since the beginning of 2014. I have been in a management and technical lead position for the [REDACTED] CPU and the [REDACTED] CPU. Presently, I manage the organization that is working on CPU development for [REDACTED]

[REDACTED] I have personal knowledge of the matters set forth below.

If called as a witness, I could and would testify competently as follows.

2. I have been asked to explain the development process for the [REDACTED]

[REDACTED] central processing unit (“CPU”) designs. [REDACTED]

[REDACTED]

[REDACTED]

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3. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. [REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED]

[REDACTED]

[REDACTED]

7. The [REDACTED] CPU was included in the Apple A7 chip. This chip is in [REDACTED] it was released to the public as part of the iPhone 5s, iPad Air, and iPad mini with Retina display.

8. The [REDACTED] CPU is included in the Apple A8 chip. This first version of the A8 chip, [REDACTED] is also very recently in [REDACTED] it was released to the public as part of the iPhone 6 and iPhone 6+. A second version of the A8 chip [REDACTED] referred to by its marketing name “A8X”) was just announced on October 16; it will be released to the public as part of the iPad Air 2.

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9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11. Apple does not sell or distribute the CPUs it designs. Rather, it designs CPUs for incorporation into its commercial end products, such as iPhones and iPads. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

15. Apple has a strong culture of secrecy regarding its designs-in-development, including its CPU, mobile device, and iOS designs. Employees are instructed to, and do, take the utmost care with respect to their communications regarding unannounced (i.e., future) products. While Apple takes care to protect all of its trade secrets, including the details pertaining to products that are on the market, it is particularly careful and sensitive about its products-in-development due to the ever-present threat of the harms caused by competitor access to Apple’s future product roadmap information.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: October 17, 2014 at Cupertino, California.

John Mylius

